

EXHIBIT 4

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

TERRI YOLANDA LABLANCE,

Plaintiff,

v.

**CORIZON HEALTH, INC. AND
MISSOURI DEPARTMENT OF
CORRECTIONS,**

Defendant.

Case No. 4:19-cv-00693-BP

DECLARATION OF STERLING REAM

I, Sterling Ream, do hereby swear and affirm as follows:

1. I make this Declaration based on personal knowledge, and if called and sworn as a witness, I could and would testify competently and truthfully to the matters stated in this Declaration.

2. I am over the age of 18 and am competent to give this Declaration.

3. I make this Declaration entirely of my own free will and choice. No promises of benefits or threats have been made to me to persuade me to sign it.

4. Before I signed this Declaration, I had the opportunity to review it, I did so, and I made any changes to the Declaration I wanted to make.

5. I am currently employed by Corizon Health, Inc. as the Health Services Administrator in the Chillicothe Correctional Facility.

6. I am familiar with Terri LaBlance as a former Corizon Nurse Practitioner at the Chillicothe facility who resigned her position on February 1, 2019, and I served as one of her supervisors in my capacity as the Health Services Administrator.

7. On June 6, 2018, Ms. LaBlance copied me on an email regarding issues she was having with lab technician Judy Harkins, which she alleged were due to her race.

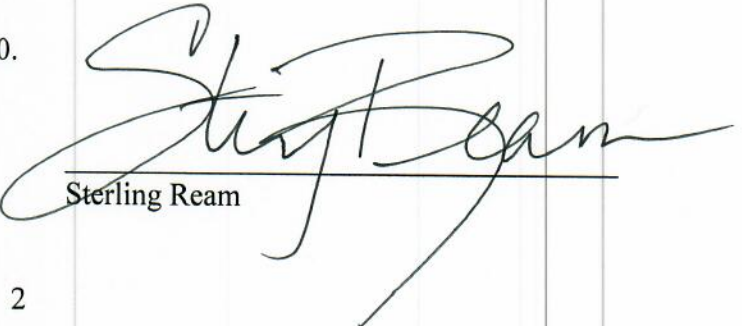
8. I was not in charge of investigating the claims, but to my knowledge the investigation concluded that the issues were not race-based but a miscommunication between Ms. LaBlance and the lab technician.

9. In my experience with Ms. LaBlance and Ms. Harkins, at times both have had previous personality conflicts with others in the workplace, but none of the issues were reported as being racial in nature and I have no reason to believe they were. To the contrary, they seemed like ordinary workplace disagreements that people have from time to time.

10. While Ms. LaBlance has come to me with administrative and medically-related issues with staff members, Ms. LaBlance has never spoken to me directly regarding the issue with the lab technician, nor has she ever reported to me any issues with Corizon staff, medical providers, or Department of Corrections officers who she apparently now says supposedly discriminated or harassed her on the basis of her race.

11. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 12, 2020.


Sterling Ream